



**HON. SYLVIA O. HINDS-RADIX**  
*Corporation Counsel*

**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**LORA MINICUCCI**  
*Assistant Corporation Counsel*  
phone: (212) 356-2078  
email: lminicuc@law.nyc.gov

April 19, 2023

BY ECF

Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, 6B  
New York, New York 10007

## MEMORANDUM ENDORSED

Re: *Local 2501 et. al. v. City of New York*, 22-cv-10336 (AT)(GWG) (“*Local 2507*”)[*rel. Chalmers et. al. v. City of New York* 20-cv-3389 (AT) (“*Chalmers*”)]

Dear Magistrate Judge Gorenstein:

I am the Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent the City of New York (“City”). I write to respectfully request that the discovery conference, currently scheduled for Friday April 21, 2023 at 11:00 a.m. be adjourned until the afternoon of April 24, 2023 at 2:30 p.m. as the undersigned is in an all-day deposition that day and my co-counsel will be out of the office.

Plaintiffs have indicated that they are available for that date and time, but will not consent unless Defendant agrees to a separate conference with Plaintiffs to discuss the discovery issues which are already before Your Honor. The parties have clearly arrived at an impasse and require the Court's intervention and Defendant's counsel is not available in the intervening time.

I thank the Court for its consideration of this request.

Respectfully submitted,

Conference adjourned to April 24, 2023, at 2:30 p.m.

So Ordered.

GABRIEL W. CORENSTEIN  
United States Magistrate Judge

ECF /s/  
Lora Minicucci  
Assistant Corporation Counsel  
lminicuc@law.nyc.gov

April 19, 2023